

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

In re:	:	Chapter 13
	:	Case No. 5:21-BK-00538-MJC
ALBANELIS DIAZ AND	:	
JOSE A. DIAZ	:	
aka JOSE ARIEL DIAZ	:	
aka JOSE DIAZ	:	
Debtor,	:	
	:	
ALLY CAPITAL,	:	
Movant,	:	Motion for
v.	:	Relief from Stay
ALBANELIS DIAZ AND	:	
JOSE A. DIAZ aka JOSE ARIEL DIAZ	:	
aka JOSE DIAZ and JACK N.	:	
ZAHAROPOULOS, Trustee	:	
Respondents	:	

**ANSWER TO MOTION OF ALLY CAPITAL,
FOR RELIEF FROM STAY**

AND NOW COMES Respondents, Albanelis Diaz and Jose Diaz, by and through their attorneys, Newman Williams, P.C., and in Answer to the Motion for Relief from Ally Capital avers as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Denied to the extent the averments of paragraph 5 constitute anything other than a statement or conclusion of law or misplaced request for relief.
6. Denied. After reasonable investigation the Defendant is without knowledge sufficient to form a belief as to the truth of this averment and therefore it is denied.

7. Denied. After reasonable investigation the Defendant is without knowledge sufficient to form a belief as to the truth of this averment and therefore it is denied.

8. Denied. After reasonable investigation the Defendant is without knowledge sufficient to form a belief as to the truth of this averment and therefore it is denied.

9. Denied to the extent the averments of paragraph 9 constitute anything other than a statement or conclusion of law or misplaced request for relief.

10. Denied to the extent the averments of paragraph 10 constitute anything other than a statement or conclusion of law or misplaced request for relief.

11. Denied to the extent the averments of paragraph 11 constitute anything other than a statement or conclusion of law or misplaced request for relief.

12. Denied to the extent the averments of paragraph 12 constitute anything other than a statement or conclusion of law or misplaced request for relief.

WHEREFORE, Respondent respectfully requests this Honorable Court issue an Order that the Motion of Ally Capital for Relief from Stay be denied, and for such other and further relief as the Honorable Court deems just and appropriate.

NEWMAN WILLIAMS, P.C.

By: /s/ Robert J. Kidwell
Robert J. Kidwell, Esquire
Attorney for Respondents
PO Box 511, 712 Monroe Street
Stroudsburg, PA 18360
(570) 421-9090; fax (570) 424-9739
rkidwell@newmanwilliams.com